

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

<b>MICHAEL COREY JENKINS, <i>et al.</i></b>	:	
	:	
<b>Plaintiffs,</b>	:	
	:	
<b>v.</b>	:	<b>Civil Action No</b>
	:	<b>3:23-cv-374-ASH-DPJ</b>
	:	
	:	
<b>RANKIN COUNTY, MISSISSIPPI, <i>et al.</i>,</b>	:	
	:	
<b>Defendants.</b>	:	

**MOTION TO DEEM ADMISSIONS ADMITTED**

Now Comes plaintiffs Michael Jenkins and Eddie Parker, by and through counsel, by and through F.R.C.P. 36(a)(3) and hereby requests that this Honorable Court deem admitted, Requests for Admission that were served on Defendant Jeffery Middleton. In support, plaintiffs states as follows:

1. Counsel for plaintiffs served Request for Admissions on defendant Jeffery Middleton through his counsel of record Don Leland at cleland@bellsouth.net on December 4, 2024. *See Exhibits A and B,*
2. Counsel for plaintiffs contacted counsel for Mr. Middleton on the dates of February 26, 2025, and re-emailed Mr. Leland on February 27, 2025, asking counsel if was he going to consent to deem admitted plaintiffs' Request for Admissions. Counsel for defendant Middleton has not responded.
3. According to F.R.C.P. 36(a)(3) defendant Middleton was required to respond to plaintiffs' Request for Admissions in thirty (30) days, or by January 3, 2025.

4. Federal Rule of Civil Procedure 36(a)(3) states:

*(3) Time to Respond; Effect of Not Responding.* A matter is admitted unless, within 30 days after being served, the party to whom the request is directed serves on the requesting party a written answer or objection addressed to the matter and signed by the party or its attorney. A shorter or longer time for responding may be stipulated to under [Rule 29](#) or be ordered by the court.

5. Therefore, Plaintiffs' requests an order deeming plaintiff's Request for Admissions to Defendant Jeffery Middleton admitted.

Respectfully submitted by:

/s/ MALIK SHABAZZ ESQ /S/  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY THAT ON FEBRUARY 28, 2025, I HAVE ELECTRONICALLY TRANSMITTED THE MOTION TO DEEM ADMISSIONS ADMITTED TO ALL COUNSEL OF RECORD USING THE ECF COURT FILING SYSTEM

Sincerely,

/S/ Malik Shabazz, Esq./S/  
MALIK SHABAZZ ESQ.